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Attorneys for Defendant Synchrony Bank

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARILEA ELLIS,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES, LLC;
EXPERIAN INFORMATION SOLUTIONS,
INC.; NATIONAL CONSUMER TELECOM &
UTILITIES EXCHANGE, INC.; COMENITY
CAPITAL BANK N.A.; PETAL CARD, INC.;
SYNCHRONY FINANCIAL; FIRST
PREMIER BANK DBA PREMIER
BANKCARD, LLC; TORONTO-DOMINION
BANK, USA, N.A dba TD BANK GROUP; and
CITIGROUP FINANCIAL PRODUCTS, INC.,
dba CITIBANKS CBNA,

Defendants.

Case No. 2:23-cv-00354-CDS-VCF

**JOINT UNOPPOSED MOTION TO
EXTEND DEADLINE FOR
DEFENDANT SYNCHRONY BANK
TO RESPOND TO COMPLAINT**

(FIRST REQUEST)

Defendant Synchrony Bank (“Synchrony”) and Plaintiff Marilea Ellis (“Plaintiff”), by counsel and pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule IA 6-1, respectfully request that this Court extend the deadline in which Synchrony has to answer or otherwise respond to Plaintiff’s Complaint, through and until April 21, 2023. In support of this Motion, the parties stipulate as follows:

1. This is the first stipulation for extension of time for Synchrony to respond to Plaintiff’s Complaint.

2. On March 7, 2023, Plaintiff filed a Complaint with this Court [ECF No. 1].

3. Synchrony's current deadline to respond to the Complaint is March 31, 2023.

4. In order to evaluate this matter and explore the possibility of early resolution with Plaintiff, counsel for Synchrony desires a twenty-one (21) day extension until April 21, 2023, to file a response to the Complaint.

5. Counsel for Synchrony conferred with Plaintiff's counsel regarding this requested extension, and Plaintiff's counsel has no objection.

6. The foregoing Motion is filed in good faith and not for dilatory or other improper purpose.

7. Plaintiff would not suffer any prejudice by the Court permitting Synchrony the requested extension of time and has consented to the requested extension.

8. Granting this Motion is in the interests of justice and is otherwise the right and proper thing to do.

DATED this 27th day of March, 2023.

**LEWIS ROCA ROTHGERBER
CHRISTIE LLP**

/s/ Brittni Tanenbaum

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Counsel for Defendant Synchrony Bank

FREEDOM LAW FIRM, LLC

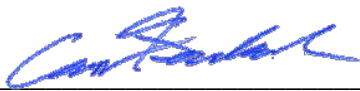
/s/ Gerardo Avalos (w/permission)

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Counsel for Plaintiff Marilea Ellis

ORDER

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 3-28-2023

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed via electronic filing using the CM/ECF system with the Clerk of the Court on March 27, 2023 which sent e-mail notification of such filing to all CM/ECF participants.

s/ Sharon L. Kuller
An Employee of Lewis Roca Rothgerber Christie LLP

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